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Mr Jason Bailey
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Department of Planning, Transport and Infrastructure



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Dear Jason

Draft Planning and Design Code – Phase 3 Submission on behalf of Sunrise Christian School

Introduction

URPS acts on behalf of Sunrise Christian School (Sunrise).

URPS has been requested to review the implications of the draft Planning and Design Code as it affects the School's landholdings. This review follows a recent refusal by Marion Council of a substantial development at Sunrise's Marion Campus. That application involved new building works as an addition to the school with an estimated development cost of \$8.5 million. That application was non-complying and the School is in the process of lodging an amended development with Council.

Sunrise Christian Schools is a member of the Association of Independent Schools South Australia (AISSA). AISSA and Catholic Education South Australia have jointly prepared a submission (through URPS) insofar as the draft Code relates to schools. Sunrise Christian School fully supports the submission by CESA and AISSA and seeks to make more detailed submission on the proposed zoning, particularly as it relates to the School's Marion Campus.

Sunrise Land

Sunrise has campuses at Fullarton, Paradise, Morphett Vale, Marion, Naracoorte and Whyalla.

The following table identifies the current and proposed zoning of each campus:

Campus	Development Plan Zoning	Planning and Design Code Zoning
Fullarton	Residential Streetscape (Built Form) Zone	Suburban Neighbourhood Zone (with Historic Area Overlay)
Paradise	Suburban Activity Node Zone	Urban Neighbourhood Zone

Morphett Vale	Residential Zone	General Neighbourhood Zone
Marion	Residential Zone Suburban Activity Node Zone Commercial Zone	General Neighbourhood Zone Urban Renewal Neighbourhood Zone Suburban Employment Zone
Naracoorte	Primary Production Zone	Rural Zone
Whyalla Norrie	Commercial Zone	Suburban Employment Zone

The School is generally supportive of the transition of zones between current Development Plans and the proposed Code. The Marion Campus is, however, of a significant concern as the Commercial Zone will be replaced with the Suburban Employment Zone. That Zone is inappropriate and inconsistent with the current Zone and Policy Area objectives.

Marion Campus

The current and proposed zoning for the Marion Campus are illustrated in the below figures:

Figure 1 Zoning under the Current Marion Council Development Plan with Sunrise Site Dashed

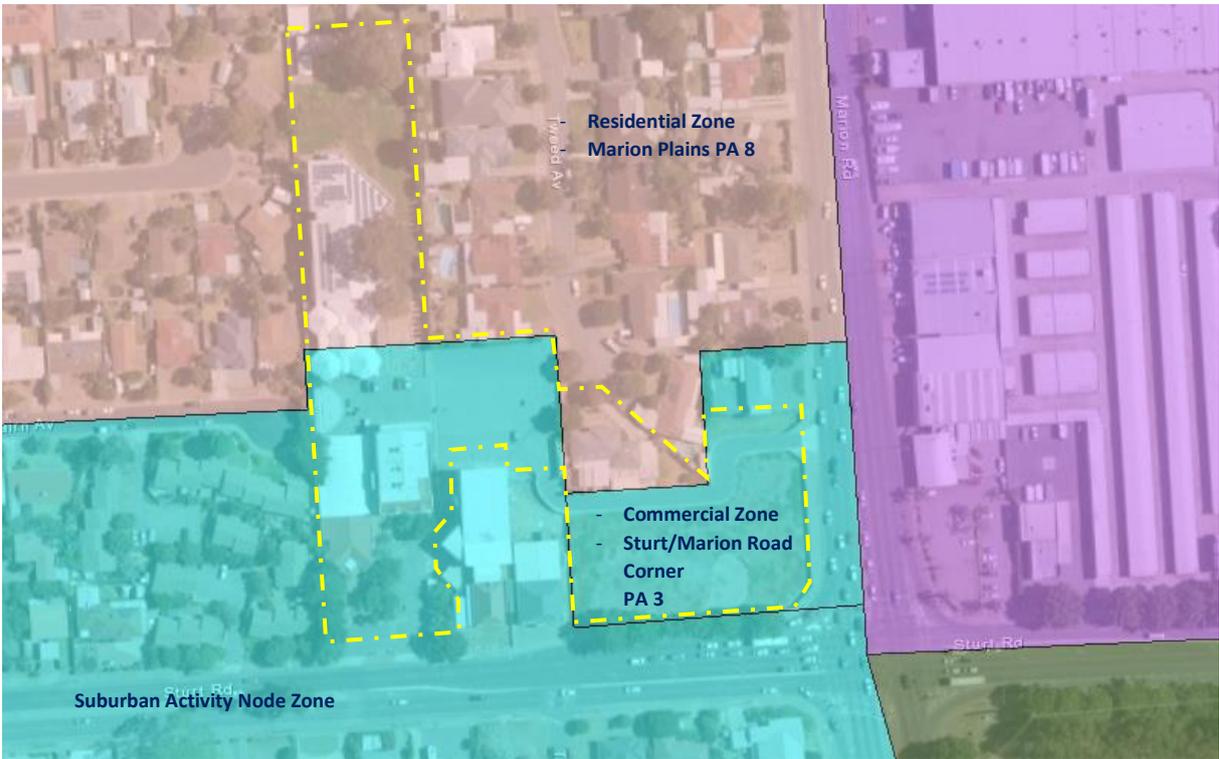


Figure 2 Zoning under the proposed Planning and Design Code with Sunrise Site Dashed



The zoning of the Marion Campus is needlessly confusing. In August 2019, the Development Plan was updated as part of the finalisation of Part 1 of Council’s Housing Diversity DPA. This DPA split the portion of the School site that was wholly within the Residential Zone to being partly within the Residential Zone and the Suburban Activity Node Zone.

While the inclusion of land within the Suburban Activity Node was supported by the School, that change should have included the entirety of the School site within the Suburban Activity Node Zone. This would have avoided unnecessary confusion between the competing objectives and envisaged land uses between the Suburban Activity Node Zone and the Residential Zone and would provide more certainty for the School and the community as to the anticipated future use and development of the School.

Through the transition to the Code, the School’s land in the Suburban Neighbourhood Zone will be rezoned to the Urban Renewal Neighbourhood Zone. Educational establishments are envisaged in the Urban Renewal Zone and, generally, the School is supportive of the provisions of the Urban Renewal Neighbourhood Zone.

The School requests that its land within the General Neighbourhood Zone and Urban Renewal Neighbourhood Zone be consolidated to the Urban Renewal Neighbourhood Zone. This would provide consistent policy across the majority of the School site.

Most importantly, the School has serious concerns with the rezoning of its land in the Commercial Zone to the Suburban Employment Zone. The Commercial Zoned land is located in the Sturt/Marion Road Corner Policy Area 3. That Policy Area seeks a limited range of land uses including consulting rooms, offices, shops (in association with consulting rooms or offices) and residential development in association with a non-residential use.

In comparison, the Suburban Employment Zone seeks a far wider range of commercial land uses. Envisaged land uses include light industrial, service trade premises and motor repair stations that are not anticipated for the site under the current Zone and Policy Area provisions. It is an inappropriate zone for the site.

The Suburban Employment Zone should be replaced by a zone that better reflects the desired land use mix of the current Development Plan. The nearest equivalent zone would be the Urban Neighbourhood Zone which envisages mixed use development. This Zone is currently drafted to be applied to a portion of the Suburban Neighbourhood Zone located approximately 300 metres south of the subject land. It would provide for a similar (but wider) land use mix and one that is not focussed on more industrial type land uses.

The Suburban Employment Zone is also a better fit for the site to deliver the desired high-quality and well-designed development that the current Policy Area provisions seek. The School supports the desire for an iconic and landmark building in this location and is working closely with Council to deliver on this objective.

Summary and Recommendations

Sunrise Christian School supports the submission to the Draft Code on behalf of CESA and AISSA.

The School also requests that the zoning for the School's Marion Campus be closely reviewed and amended to provide consistency across the site and better reflect the nature of the existing zoning. It is suggested that this be achieved through:

- incorporating land proposed to be within the General Neighbourhood Zone to the Urban Renewal Neighbourhood Zone, and
- incorporating land proposed to be within the Suburban Employment Zone to the Urban Neighbourhood Zone.

The suggested zoning would not make any change to assessment procedure with educational establishments being assessed as performance assessed development across all relevant zones. It would also not make any change to the public notification procedure as the school would remain located on a zone boundary where public notification is required in any event.

Thank you for the opportunity to provide this submission.

Please call me if you have any questions on [REDACTED].

Yours sincerely



Simon Channon
Senior Associate